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**DOCKET FILE COPY ORIGINAL**

October 30, 1997

1800.002

**BY HAND**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**RECEIVED**

OCT 31 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

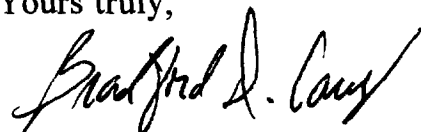
RE: In the Matter of Amendment of §73.202(b)  
Table of Allotments - FM Broadcast Stations  
Kerrville, Texas  
*Petition for Rulemaking*

Dear Mr. Caton:

Enclosed please find the original and four (4) copies of a Petition for Rulemaking for filing with the Commission in connection with the above-captioned. There is no filing fee required with the filing of this Petition.

If you should have any questions regarding this matter, kindly direct them to the undersigned.

Yours truly,



Bradford D. Carey

BDC/mv  
Enclosures

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Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

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In the Matter of )

Amendment of §73.202(b) )  
Table of Allotments )  
FM Broadcast Stations )

**KERRVILLE, TEXAS** )  
)  
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)  
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)

MM Docket No. \_\_\_\_\_

RM \_\_\_\_\_

TO: Chief, Allocations Branch, Mass Media Bureau

**PETITION FOR RULE MAKING**

The Stronghold Foundation, Inc. ("Petitioner") hereby files this Petition for Rule Making ("Petition"), seeking the allotment of a new class A FM Broadcast channel to Kerrville, Texas on Channel 291A.

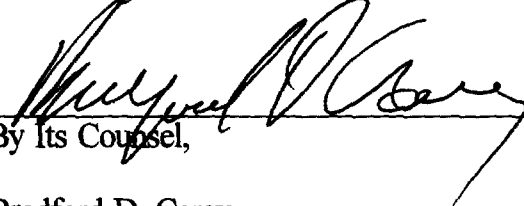
The Petitioner hereby commits that if the channel is allotted, it will file an application for a construction permit to build a facility on the channel. If granted a permit, Petitioner will build and operate a station on the channel.

The attached Engineering Statement establishes that the channel can be allotted to Kerrville, Texas in conformance with the technical rules of the Commission, without requiring other changes to the Table of Allotments, FM Broadcast Stations.

Presently, there are two FM stations and one AM station allotted to Kerrville, Texas. Thus, it is clearly a community to which a station may be allotted.

Respectfully Submitted,

The Stronghold Foundation, Inc.

  
By Its Counsel,

Bradford D. Carey  
Hardy & Carey, L.L.P.  
111 Veterans Blvd., Suite 255  
Metairie, Louisiana 70005

(504) 830-4646

Dated: October 30, 1997

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ENGINEERING STATEMENT  
IN SUPPORT OF A  
PETITION FOR RULEMAKING  
TO ADD FM CHANNEL 291A  
TO KERRVILLE, TEXAS

**ORIGINAL**

This engineering statement was prepared on behalf of The Stronghold Foundation, Inc., to accompany a Petition for Rulemaking to amend the Table of Allotments for FM channels, Section 73.202(b) of the FCC Rules, to add Channel 291A (106.1 MHz) to Kerrville, Texas. This channel can be assigned to Kerrville without requiring any other changes in the Table of Allotments.

The 1990 Census reports the population of Kerrville, Texas as 17,384 persons, and that it is located in Kerr County (pop. 36,304). There are presently two FM channels allocated for use at Kerrville, and there are two FM and one AM stations presently assigned. Accordingly, it is proposed to change the allotments at Kerrville from 222C2 and 232C2 to 222C2, 232C2 and 291A.

Figure 1, attached hereto, is a listing of the nearest stations and/or assignments on channels pertinent to the use of Channel 291A at Kerrville, Texas. The geographic coordinates used for compiling Figure 1 are the coordinates of a reference point at Latitude 30° 02' 50", Longitude 99° 08' 50". These are the coordinates for Kerrville as listed in the National Atlas. Since the coordinates for the reference point are the same as the coordinates listed for Kerrville, the assignment of Channel 291A at Kerrville could be made with no site restriction. The 60 dBu (1 mV/m) contour of a class A station with maximum transmitting facilities at the reference point would encompass a population of 40,302 persons in an area of 2500 square kilometers.

**GALLAGHER & ASSOCIATES**

CONSULTING RADIO ENGINEERS

HAGERSTOWN, MD

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I, Charles I. Gallagher, certify under penalty of perjury that this engineering statement and the associated exhibit have been prepared by me or under my direct supervision. I further state that I am a Consulting Radio Engineer, and a Registered Professional Engineer in the State of Maryland, Registration No. 11415, that my qualifications are a matter of record with the Federal Communications Commission, having been presented on previous occasions. The contents of this Engineering Statement are true and correct to the best of my knowledge, information and belief.



Charles I. Gallagher

October 16, 1997

# GALLAGHER & ASSOCIATES

CONSULTING RADIO ENGINEERS

HAGERSTOWN, MD

Database: FCC 9/97

FIGURE 1

## COMPUTERIZED SEPARATIONS STUDY

KERRVILLE, TEXAS

Reference Point: 30° 02' 50" 99° 08' 24"

BASED ON SEPARATIONS IN SECTION 73.207

Channel No. 291 as a Class A

CALL	LOCATION	STATUS	FILE NUMBER	CHANNEL	ERP	HAAT	AZM.	DIST.	REQ'D	CLEAR
KRBH	HONDO, TX	ADD	cDocket-90-466	290A			187.9	78.0	72	6.0
NEW	ROUND ROCK, TX	APP	BPH-880714ML	290C2	50.0	150	71.9	121.5	106	15.5
KCJZ	TERRELL HILLS, TX	LIC	BLH-850508KY	294C	100	310	147.5	113.3	95	18.3
NEW	ROUND ROCK, TX	APP	BPH-880714NJ	290C2	36	174	67.6	129.9	106	23.9
NEW	ROUND ROCK, TX	APP c	BPH-880714MN	290C2	25.0	199	67.6	129.9	106	23.9
ALLOC	ROUND ROCK, TX	VAC	cDocket-86-442	290C2			64.7	136.6	106	30.6

Note: Distances are in kilometers

\* = Section 73.215 Assignment

This report contains information compiled from a commercial data base service. Gallagher & Associates believes the service to be an accurate and current source of information. However, Gallagher & Associates shall not assume responsibility for erroneous or incomplete information in this report.